

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re: David Stein and Marian S. Stein aka
Marion Stein aka Marian Sue Stein,
Debtors.

CHAPTER 13

BANKRUPTCY CASE NUMBER
15-03155/RNO

**NATIONSTAR MORTGAGE LLC d/b/a MR. COOPER'S NOTICE OF
DEBTOR'S REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor Nationstar Mortgage LLC d/b/a Mr. Cooper ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 6 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting April 1, 2020 through September 1, 2020. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period.

Per the request, Debtor will resume Mortgage payments beginning October 1, 2020 and will be required to cure the delinquency created by the forbearance period (hereinafter "forbearance arrears"). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully submitted,

/s/ Kristen D. Little

Dated: April 6, 2020

BY: _____
Kristen D. Little, Esquire
Shapiro & DeNardo, LLC
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
(610) 278-6800/ fax (847) 954-4809
PA BAR ID #79992
mjclark@logs.com
pabk@logs.com

S&D File #:15-050849

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CERTIFICATE OF SERVICE

I, Leslie Thomas, an employee of the law firm of Shapiro & DeNardo, LLC hereby certify that I caused to be served true and correct copies of Notice of Forbearance by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on April 6, 2020:

David Stein
511 Woodhaven Lane
Stroudsburg, PA 18360

Marian S. Stein aka Marion Stein aka Marian Sue Stein
511 Woodhaven Lane
Stroudsburg, PA 18360

Fisher Christman
530 Main Street
Stroudsburg, PA 18360
Sent via electronic notification zac@fisherchristman.com

Charles J. DeHart, III, Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
Sent via electronic notification dehartstaff@pamd13trustee.com

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
TRUE AND CORRECT.

/s/ Leslie Thomas

Leslie Thomas
Shapiro & DeNardo, LLC
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
(610) 278-6800

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